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6 Attorney for Thomas H. Casey,
Chapter 7 Bankruptcy Trustee

7 UNITED STATES BANKRUPTCY COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA / SANTA ANA DIVISION

10 In re

11 ZIA SHLAIMOUN,

12 Debtor.

) Case No. 8:17-bk-10976-TA

) Chapter 7

) **CHAPTER 7 TRUSTEE'S MOTION FOR
ORDER DISALLOWING CLAIMS FILED
BY:**

) **1) GEORGE P. ESHOO, CLAIM NO. 12**

) **2) GEORGE P. ESHOO, CLAIM NO. 13**

) **3) TAHIM AND ASSOCIATES, A
PROFESSIONAL CORPORATION,
CLAIM NO. 15**

) **MEMORANDUM OF POINTS AND
AUTHORITIES; AND DECLARATION
OF CHAPTER 7 TRUSTEE THOMAS H.
CASEY**

) Hearing Date

) Date: January 4, 2022

) Time: 11:00 a.m.

) Courtroom: 5B

) Location: 411 West Fourth Street
Santa Ana, CA 92701

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**TO THE HONORABLE THEODOR C. ALBERT, UNITED STATES BANKRUPTCY
JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
PARTIES:**

Thomas H. Casey, Chapter 7 Trustee (“Trustee”) for the estate of Zia Shlaimoun
 (“Debtor”), hereby objects to the filed claims of 1) George P. Eshoo - #12; 2) George P. Eshoo -
 #13; and 3) Tahim and Associates, A Professional Corporation – #15 (“Claim Objection”).

In support thereof, the Trustee respectfully represents as follows:

Background Information

1. On March 15, 2017, the Debtor filed a voluntary petition (skeletal) for relief
 under Chapter 13 of the Bankruptcy Code. The balance of Debtor’s Schedules and Statement of
 Financial Affairs were filed on June 20, 2017.

2. On March 28, 2017, this case was converted to one under Chapter 7 and Thomas
 H. Casey was appointed as Trustee.

3. On July 31, 2017, the Trustee filed a Notice of Asset Case, and the Court
 thereafter issued a Notice of Possible Dividend and Order Fixing Time to File Claims, setting a
 claims bar date of November 3, 2017 (“Claims Bar Date Notice”). Attached hereto as **Exhibit**
 “1” is a true and correct copy of the Claims Bar Date Notice.

4. On or about August 2, 2017, the BNC issued its Certificate of Notice, which
 provides a list of all parties served with the Claims Bar Date Notice (“BNC Certificate”).
 Attached hereto as **Exhibit “2”** is a true and correct copy of the BNC Certificate.

5. On June 16, 2019, the Court held a hearing on the Court’s “Status Conference re
 Notice Issues and Potential Reopening of Opportunity to File Claims.”

1 6. On July 17, 2019, for the reasons stated on the record, the Court entered its Order
2 Reopening Time for Filing Claims (“Order Setting Bar Date”). Attached hereto as **Exhibit “3”** is
3 a true and correct copy of the Order Setting Bar Date.

4 7. Pursuant to the Order Setting Bar Date, the deadline time for filing claims was
5 reopened for a period of 60 days (measured from date of entry of this order) so that creditors who
6 did not receive notice of the opportunity to file claims may do so. Accordingly, the new claims
7 bar date was determined to be September 16, 2019.

8 8. On or about July 20, 2019, the BNC issued its Certificate of Notice, which
9 provides a list of all parties served with a second claims bar date notice (“2nd BNC Certificate”).
10 Attached hereto as **Exhibit “4”** is a true and correct copy of the 2nd BNC Certificate.
11

12 **Trustee’s Objection to Claims**

13 **CLAIM NO. 12 – GEORGE P. ESHOO**

14 9. On or about June 20, 2019, George P. Eshoo (“Mr. Eshoo” or “Claimant”) filed a
15 general unsecured claim in the amount of \$551,798.43. This claim is docketed as Claim No. 12
16 on the Court’s claims register (“Claim No. 12”). Attached hereto as **Exhibit “5”** is a true and
17 correct copy of Claim No. 12.
18

19 10. According to Claim No. 12, the basis of the claim is for “Legal services (Feb. 2,
20 2015 to July 31, 2018), hard costs advanced and interest on unpaid balance to June 20, 2019.”
21

22 11. Attached as supporting documentation to Claim No. 12 is a one-page breakdown
23 of attorney fees, costs and interest through June 20, 2019.
24

25 12. On November 1, 2021, the Trustee’s office emailed Mr. Eshoo and requested that
26 he provide back-up documentation to Claim No. 12 that may include, but not limited to, a fully
27 executed retainer agreement and redacted time entries for his representation of the individual
28

1 Debtor in pre-petition state court litigation. The Trustee's office also advised that Mr. Eshoo is
2 not entitled to any fees, costs or interest incurred post-petition. In addition, it appeared that Claim
3 No. 13 (see below) was a duplicate of Claim No. 12. The Trustee's office requested that Mr.
4 Eshoo file a withdrawal of Claim No. 13. Attached hereto as **Exhibit "6"** is a true and correct
5 copy of the November 1, 2021 email from the Trustee's office to Mr. Eshoo.
6

7 13. On November 4, 2021, Mr. Eshoo forwarded a written response to the Trustee
8 that advised the following:

- 9 a. Claimant Eshoo intended Claim No. 13 to replace Claim No. 12. This is
10 noted in the Remarks in the Claims Registry at each Claim No. 12 and
11 Claim No. 13.
12
13 b. We recall that you (a) already asked the same question in 2019 or 2020;
14 (b) were not satisfied with the response; and (c) unilaterally withdrew on
15 of the two Claims. The Claim Nbr. that was removed is not resolved by
16 the case registry nor prior email correspondence, and I will not guess
17 while at risk of removing the sole remaining Claim.
18
19 c. Claimant Eshoo intended Claim No. 13 to replace Claim No. 12 as noted
20 in the Remarks on the Claims Registry. If you erred in any way such as
21 removed the wrong Claim, then the error(s) need(s) to be repaired so that
22 the Law Office Claim remains intact without e.g. any reduction in priority
23 nor introduction of other prejudice.
24

25 14. The remarks made by Mr. Eshoo on the claims register that Claim No. 13 was
26 replacing Claim No. 12, does not remove defective Claim No. 12 from the claims register.
27
28

1 15. In addition, the Trustee was not able to locate any 2019 or 2020 email
2 correspondence between the Trustee's office and Mr. Eshoo regarding a resolution to his filed
3 claims. Trustee's do not "unilaterally withdraw" claims filed by creditors. Attached hereto as
4 **Exhibit "7"** is a true and correct copy of Mr. Eshoo's November 4, 2021 response to the
5 November 1, 2021 email from the Trustee's office to Mr. Eshoo.
6

7 16. While the amounts are different, a review of Claim No. 12 and Claim No. 13
8 indicate that both claims contain the same basis and essentially the same supporting
9 documentation. The difference in Claim No. 12 and Claim No. 13 is the dollar amount as Mr.
10 Eshoo extends the "ongoing interest" to a later date in Claim No. 13.
11

12 17. Claim No. 12 lacks adequate documentation to support the claim and is a
13 duplicate of Claim No. 13.

14 18. Based on the above, the Trustee objects to Claim No. 12 and the Trustee requests
15 that Claim No. 12 be disallowed in its entirety.
16

17 **CLAIM NO. 13 – GEORGE P. ESHOO**

18 19. On or about July 18, 2019, George P. Eshoo ("Mr. Eshoo" or "Claimant") filed a
19 general unsecured claim in the amount of \$615,229.02. This claim is docketed as Claim No. 13
20 on the Court's claims register ("Claim No. 13"). Attached as **Exhibit "8"** is a true and correct
21 copy of Claim No. 13.
22

23 20. According to Claim No. 13, the basis of the claim is "legal services (2 Feb 2015
24 to 31 July 2018) and interest on unpaid balance to 30 June 2019. Hard Costs Pending."

25 21. Attached as supporting documentation to Claim No. 13 is a one-page breakdown
26 of attorney fees, costs and interest through July 18, 2019.
27
28

1 22. As stated above, on November 1, 2021, the Trustee's office emailed Mr. Eshoo
2 and requested that he provide back-up documentation to Claim No. 13 that may include, but not
3 limited to, a fully executed retainer agreement and redacted time entries for his representation of
4 the individual Debtor in pre-petition state court litigation. The Trustee's office also advised Mr.
5 Eshoo that he is not entitled to any fees, costs or interest incurred post-petition. In addition, it
6 appeared that Claim No. 12 (see above) was a duplicate of Claim No. 13. The Trustee's office
7 requested that Mr. Eshoo file a withdrawal of duplicate Claim No. 13 and provide supporting
8 documentation of the remaining claim. *See*, Exhibit "6".
9

10 23. On November 4, 2021, Mr. Eshoo responded to the November 1, 2021 email from
11 the Trustee's office. *See*, Exhibit "7".
12

13 24. As of the filing of this Claim Objection, Mr. Eshoo has not provided sufficient
14 supporting documentation to Claim No. 13, nor a response to the Trustee informing Mr. Eshoo
15 that he is not entitled to any legal fees, costs or interest incurred post-petition.
16

17 25. Claim No. 13 lacks adequate documentation to support the claim.
18

19 26. Based on the above, the Trustee objects to Claim No. 13 and the Trustee requests
20 that Claim No. 13 be disallowed in its entirety.

21 **CLAIM NO. 15 – TAHIM AND ASSOCIATES, A PROFESSIONAL CORPORATION**

22 27. On or about September 12, 2019, Tahim and Associates, a Professional
23 Corporation ("Tahim" or "Claimant") filed a general unsecured claim in the amount of
24 \$6,125.00. This claim is docketed as Claim No. 15 on the Court's claims register ("Claim No.
25 15"). Attached hereto as **Exhibit "9"** is a true and correct copy of Claim No. 15.

26 28. According to Claim No. 15, the basis of the claim is for "Services performed."
27
28

1 29. Attached as supporting documentation to Claim No. 15 is an invoice addressed to
2 Versailles Investments, LLC for, among other things, preparation of 2014 and 2015 Federal and
3 State LLC income tax returns for Versailles Investments, LLC as well as reconciling bank
4 accounts for all 12 months of 2014 for both accounts. Also attached is a breakdown of the
5 calculation of post-petition interest for the invoice for Tahim's client Versailles Investments,
6 LLC.
7

8 30. During the month of November 2021, the Trustee's office communicated with
9 Tahim and requested they provide back-up documentation to Claim No. 15 that would
10 demonstrate the individual Debtor was liable for the debt listed in Claim No. 15. Tahim advised
11 the Trustee's office that in addition to the LLC, their office prepared the Debtor's individual tax
12 returns and that they would locate and provide those documents. Tahim later advised the
13 Trustee's office that they were able to only locate the LLC tax returns and not the individual tax
14 returns. The Trustee's office requested Tahim to forward any documents they located to support
15 Claim No. 15. To date, the Trustee's office has yet to receive any documentation from Tahim
16 suggesting the individual Debtor is liable for the debt listed in Claim No. 15. Copies of the
17 relevant November 2021 emails between the Trustee's office and Tahim are attached hereto as
18 collective **Exhibit "10"** and incorporated herein by this reference.
19
20

21 31. Claim No. 15 lacks adequate documentation to support the claim.
22

23 32. Based on the above, the Trustee objects to Claim No. 15 and the Trustee requests
24 that Claim No. 15 be disallowed in its entirety.

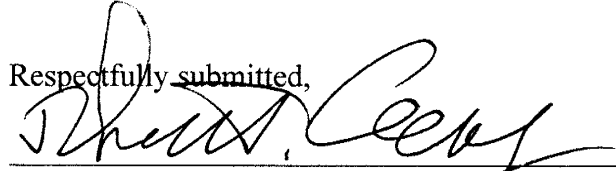
25 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court sustain the
26 Trustee's objections as follows:

27 a. Claim No. 12 is disallowed in its entirety;
28

- b. Claim No. 13 is disallowed in its entirety; and,
- c. Claim No. 15 is disallowed in its entirety.

Dated: December 3, 2021

Respectfully submitted,



Thomas H. Casey, Attorney for Thomas H. Casey,
Chapter 7 Trustee for the estate of Zia Shlaimoun

MEMORANDUM OF POINTS AND AUTHORITIES

I.

**THE TRUSTEE MAY OBJECT TO PROOF OF CLAIMS FILED
AGAINST THE DEBTOR'S ESTATE**

A proof of claim is deemed allowed unless a party in interest objects under Section 502(a) of Title 11 of the United States Code (“Bankruptcy Code”).

Bankruptcy Code Section 502(a), states:

“(a) A claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest, including a creditor of a general partner in a partnership that is a debtor in a case under chapter 7 of this title, objects.”

The trustee is a party in interest, and therefore, has standing to object to claims. *See, 11 U.S.C. §704(5)*(requiring chapter 7 trustees to “examine proofs of claim and object to the allowance of any claim that is improper[.]”); *In re GI Industries, Inc.*, 204 F.3d 1276, 1280-1281 (9th Cir. 2000)(“[T]he trustee had standing to challenge the claim under 11 U.S.C. § 502(a) because a trustee is a “party in interest.”)

II.

GROUND FOR OBJECTION TO CLAIM

Bankruptcy Code Section 502(b) enumerates the grounds for disallowance and provides for allowance by the Bankruptcy Court “except to the extent that . . . such claim is unenforceable against the debtor and property of the debtor under any agreement or applicable law for a reason other than because such claim is contingent or unmatured”. 11 U.S.C. § 502(b)(1). In other words, any defense the debtor may have to the enforceability to the claim outside bankruptcy is a good defense to the allowance of the claim to the estate. 3 *Collier on Bankruptcy*, ¶502.02 (15th ed. 1993).

1 While a proof of claim is *prima facie* valid, it will not be allowed to the extent that the
2 claim is for “an unenforceable debt against the debtor . . .” 11 U.S.C. § 502(b)(1).

3
4 **III.**
THE BURDEN OF PROOF OF THE CLAIM
RESTS WITH THE CLAIMANT

5
6 Absent an objection, a proof of claim constitutes *prima facie* evidence of the validity and
7 amount of the claim under Fed. R. Bankr. P. 3001(f). *Lundell v. Anchor Constr. Specialists, Inc.*,
8 223 F.3d 1035, 1039 (9th Cir. 2000). “A properly filed claim constitutes *prima facie* evidence of
9 validity and amount.” *Fed. R. Bankr. Proc.* 3001(f); *In re Aulicino*, 48 B.R. 252, 254 (Bankr.
10 Conn, 1985) (citations omitted).

11
12 While the burden of persuasion is always on a claimant, the burden of proof for claims is
13 a shifting one: a claim is *prima facie* valid if it alleges facts sufficient to support a legal liability
14 to the claimant; if the objector then produced evidence to refute at least one of the allegations
15 essential to the claim’s legal sufficiency, the burden of going forward shifts back to the claimant
16 to prove the validity of the claim by a preponderance of the evidence. *See In re Allegheny*
17 *International, Inc.*, 954 F.2d 167 (3rd Cir. 1992).

18
19 The filing of an objection to a proof of claim “creates a dispute which is a contested
20 matter” within the meaning of *Fed. R. Bankr. P.* 9014 and must be resolved after notice and
21 opportunity for hearing upon a motion for relief. *Id.*

22
23 When a creditor has filed a proof of claim that complies with the rules, thereby giving
24 rise to the presumption of validity, the burden shifts to the objecting party who must “present
25 evidence to overcome the *prima facie* case.” *In re Medina*, 205 B.R. 216, 222 (9th Cir. BAP
26 1996). To defeat the claim, the objector must come forward with sufficient evidence and “show
27 facts tending to defeat the claim by probative force equal to that of the allegations of the proofs
28

1 of claim themselves.” *Lundell, supra*, 223 F.3d at 1039, quoting *In re Holm*, 931 F.2d 620, 623
2 (9th Cir. 1991). “The objector must produce evidence which, if believed, would refute at least
3 one of the allegations that is essential to the claim’s legal sufficiency.” *Id. at* 1040.

4 If the objector produces sufficient evidence to negate one or more of the sworn facts in
5 the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a
6 preponderance of the evidence. *In re Consol. Pioneer Mort.*, 178 B.R. 222, 226 (9th Cir. BAP
7 1995), *aff’d*, 91 F.3d 151 (9th Cir. 1996). The ultimate burden of persuasion remains at all times
8 on the claimant. *Lundell, supra*, at 1039; *Holm, supra*.

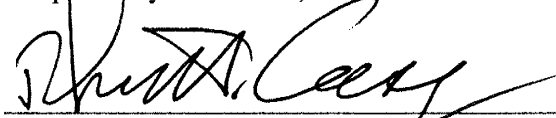
10 In this case, the Trustee has demonstrated that Mr. Eshoo has filed a duplicate claim and
11 has not provided sufficient evidence supporting the remaining claim on file. In addition, the
12 Trustee has demonstrated that Tahim has failed to provide sufficient documentation supporting
13 their filed claim. Accordingly, Claim No. 12, Claim No. 13 and Claim No. 15 should be
14 disallowed in their entirety.
15

16
17 **IV.**
CONCLUSION

18 For good cause as set forth above, the Trustee respectfully requests that this Honorable
19 Court sustain the Claim Objection, and for such other and further relief as this Court deems just
20 and proper.
21

22
23 Dated: December 2, 2021

Respectfully submitted,



Thomas H. Casey, Attorney for Thomas H. Casey,
Chapter 7 Trustee for the estate of Zia Shlaimoun

DECLARATION OF THOMAS H. CASEY

I, Thomas H. Casey, declare:

1. I am over the age of eighteen and the duly appointed, qualified and acting Chapter 7 Trustee (“Trustee”) of the bankruptcy estate of *In re Zia Shlaimoun* (“Debtor”). The facts contained herein are based upon information which I have acquired in my capacity as Trustee and upon my review of the pleadings, records and files in this matter, and are true and correct to the best of my knowledge, information and belief.

2. I make this Declaration in support of my Motion for Order Disallowing (“Claim Objection”) the Filed Claims by 1) George P. Eshoo – Claim No. 12; 2) George P. Eshoo – Claim No. 13; and 3) Tahim and Associates, A Professional Corporation – Claim No. 15 (“Claim Objection”).

3. On March 15, 2017, the Debtor filed a voluntary petition (skeletal) for relief under Chapter 13 of the Bankruptcy Code. The balance of Debtor’s Schedules and Statement of Financial Affairs were filed on June 20, 2017.

4. On March 28, 2017, this case was converted to one under Chapter 7 and I was appointed as Trustee.

5. On July 31, 2017, I filed a Notice of Asset Case, and the Court thereafter issued a Notice of Possible Dividend and Order Fixing Time to File Claims, setting a claims bar date of November 3, 2017 (“Claims Bar Date Notice”). Attached hereto as **Exhibit “1”** is a true and correct copy of the Claims Bar Date Notice.

6. On or about August 2, 2017, the BNC issued its Certificate of Notice, which provides a list of all parties served with the Claims Bar Date Notice (“BNC Certificate”). Attached hereto as **Exhibit “2”** is a true and correct copy of the BNC Certificate.

1 7. On June 16, 2019, the Court held a hearing on the Court's "Status Conference re
2 Notice Issues and Potential Reopening of Opportunity to File Claims."

3 8. On July 17, 2019, for the reasons stated on the record, the Court entered its Order
4 Reopening Time for Filing Claims ("Order Setting Bar Date"). Attached hereto as **Exhibit "3"** is
5 a true and correct copy of the Order Setting Bar Date.
6

7 9. Pursuant to the Order Setting Bar Date, the deadline time for filing claims was
8 reopened for a period of 60 days (measured from date of entry of this order) so that creditors who
9 did not receive notice of the opportunity to file claims may do so. Accordingly, the new claims
10 bar date was determined to be September 16, 2019.
11

12 10. On or about July 20, 2019, the BNC issued its Certificate of Notice, which
13 provides a list of all parties served with a second claims bar date notice ("2nd BNC Certificate").
14 Attached hereto as **Exhibit "4"** is a true and correct copy of the 2nd BNC Certificate.
15

16 11. On or about June 20, 2019, George P. Eshoo ("Mr. Eshoo" or "Claimant") filed a
17 general unsecured claim in the amount of \$551,798.43. This claim is docketed as Claim No. 12
18 on the Court's claims register ("Claim No. 12"). Attached hereto as **Exhibit "5"** is a true and
19 correct copy of Claim No. 12.
20

21 12. According to Claim No. 12, the basis of the claim is for "Legal services (Feb. 2,
22 2015 to July 31, 2018), hard costs advanced and interest on unpaid balance to June 20, 2019."
23

24 13. Attached as supporting documentation to Claim No. 12 is a one-page breakdown
25 of attorney fees, costs and interest through June 20, 2019.
26

27 14. On November 1, 2021, at my direction, my office emailed Mr. Eshoo and
28 requested that he provide back-up documentation to Claim No. 12 that may include, but not
limited to, a fully executed retainer agreement and redacted time entries for his representation of

1 the individual Debtor in pre-petition state court litigation. My office also advised that Mr. Eshoo
2 is not entitled to any fees, costs or interest incurred post-petition. In addition, it appeared that
3 Claim No. 13 (see below) was a duplicate of Claim No. 12. My office requested that Mr. Eshoo
4 file a withdrawal of Claim No. 13. Attached hereto as **Exhibit "6"** is a true and correct copy of
5 the November 1, 2021 email from my office to Mr. Eshoo.
6

7 15. On November 4, 2021, Mr. Eshoo forwarded a written response to me that
8 advised the following:

9 a. Claimant Eshoo intended Claim No. 13 to replace Claim No. 12. This is noted in the
10 Remarks in the Claims Registry at each Claim No. 12 and Claim No. 13.

11 b. We recall that you (a) already asked the same question in 2019 or 2020; (b) were not
12 satisfied with the response; and (c) unilaterally withdrew on of the two Claims. The
13 Claim Nbr. that was removed is not resolved by the case registry nor prior email
14 correspondence, and I will not guess while at risk of removing the sole remaining
15 Claim.
16

17 c. Claimant Eshoo intended Claim No. 13 to replace Claim No. 12 as noted in the
18 Remarks on the Claims Registry. If you erred in any way such as removed the wrong
19 Claim, then the error(s) need(s) to be repaired so that the Law Office Claim remains
20 intact without e.g. any reduction in priority nor introduction of other prejudice.
21

22 16. The remarks made by Mr. Eshoo on the claims register that Claim No. 13 was
23 replacing Claim No. 12, does not remove defective Claim No. 12 from the claims register.
24

25 17. In addition, I was not able to locate any 2019 or 2020 email correspondence
26 between my office and Mr. Eshoo regarding a resolution to his filed claims. Trustee's do not
27 "unilaterally withdraw" claims filed by creditors. Attached hereto as **Exhibit "7"** is a true and
28

1 correct copy of Mr. Eshoo's November 4, 2021 response to the November 1, 2021 email from
2 my office to Mr. Eshoo.

3 18. While the amounts are different, a review of Claim No. 12 and Claim No. 13
4 indicate that both claims contain the same basis and essentially the same supporting
5 documentation. The difference in Claim No. 12 and Claim No. 13 is the dollar amount as Mr.
6 Eshoo extends the "ongoing interest" to a later date in Claim No. 13.
7

8 19. Claim No. 12 lacks adequate documentation to support the claim and is a
9 duplicate of Claim No. 13.

10 20. Based on the above, I object to Claim No. 12 and I request that Claim No. 12 be
11 disallowed in its entirety.
12

13 21. On or about July 18, 2019, George P. Eshoo ("Mr. Eshoo" or "Claimant") filed a
14 general unsecured claim in the amount of \$615,229.02. This claim is docketed as Claim No. 13
15 on the Court's claims register ("Claim No. 13"). Attached as **Exhibit "8"** is a true and correct
16 copy of Claim No. 13.
17

18 22. According to Claim No. 13, the basis of the claim is "legal services (2 Feb 2015
19 to 31 July 2018) and interest on unpaid balance to 30 June 2019. Hard Costs Pending."

20 23. Attached as supporting documentation to Claim No. 13 is a one-page breakdown
21 of attorney fees, costs and interest through July 18, 2019.
22

23 24. As stated above, on November 1, 2021, my office emailed Mr. Eshoo and
24 requested that he provide back-up documentation to Claim No. 13 that may include, but not
25 limited to, a fully executed retainer agreement and redacted time entries for his representation of
26 the individual Debtor in pre-petition state court litigation. My office also advised Mr. Eshoo that
27 he is not entitled to any fees, costs or interest incurred post-petition. In addition, it appeared that
28

1 Claim No. 12 (see above) was a duplicate of Claim No. 13. My office requested that Mr. Eshoo
2 file a withdrawal of duplicate Claim No. 13 and provide supporting documentation of the
3 remaining claim. *See*, Exhibit “6”.

4 25. On November 4, 2021, Mr. Eshoo responded to the November 1, 2021 email from
5 my office. *See*, Exhibit “7”.

6 26. As of the filing of this Claim Objection, Mr. Eshoo has not provided sufficient
7 supporting documentation to Claim No. 13, nor a response to me informing Mr. Eshoo that he is
8 not entitled to any legal fees, costs or interest incurred post-petition.
9

10 27. Claim No. 13 lacks adequate documentation to support the claim.

11 28. Based on the above, I object to Claim No. 13 and I request that Claim No. 13 be
12 disallowed in its entirety.
13

14 29. On or about September 12, 2019, Tahim and Associates, a Professional
15 Corporation (“Tahim” or “Claimant”) filed a general unsecured claim in the amount of
16 \$6,125.00. This claim is docketed as Claim No. 15 on the Court’s claims register (“Claim No.
17 15”). Attached hereto as **Exhibit “9”** is a true and correct copy of Claim No. 15.
18

19 30. According to Claim No. 15, the basis of the claim is for “Services performed.”

20 31. Attached as supporting documentation to Claim No. 15 is an invoice addressed to
21 Versailles Investments, LLC for, among other things, preparation of 2014 and 2015 Federal and
22 State LLC income tax returns for Versailles Investments, LLC as well as reconciling bank
23 accounts for all 12 months of 2014 for both accounts. Also attached is a breakdown of the
24 calculation of post-petition interest for the invoice for Tahim’s client Versailles Investments,
25 LLC.
26
27
28

1 32. During the month of November 2021, my office communicated with Tahim and
2 requested they provide back-up documentation to Claim No. 15 that would demonstrate the
3 individual Debtor was liable for the debt listed in Claim No. 15. Tahim advised my office that in
4 addition to the LLC, their office prepared the Debtor's individual tax returns and that they would
5 locate and provide those documents. Tahim later advised my office that they were able to only
6 locate the LLC tax returns and not the individual tax returns. My office requested Tahim to
7 forward any documents they located to support Claim No. 15. To date, my office has yet to
8 receive any documentation from Tahim suggesting the individual Debtor is liable for the debt
9 listed in Claim No. 15. Copies of the relevant November 2021 emails between my office and
10 Tahim are attached hereto as collective **Exhibit "10"** and incorporated herein by this reference.

11
12
13 33. Claim No. 15 lacks adequate documentation to support the claim.

14 34. Based on the above, I object to Claim No. 15 and I request that Claim No. 15 be
15 disallowed in its entirety.

16
17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct and that this Declaration was executed on December 3, 2021, at
19 Mission Viejo, California.

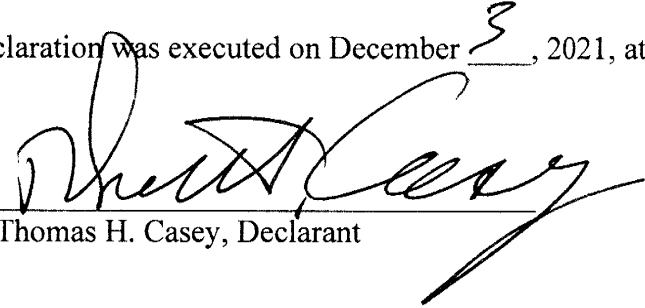
20
21 
22 Thomas H. Casey, Declarant
23
24
25
26
27
28

Exhibit 1

**United States Bankruptcy Court
Central District of California**

411 West Fourth Street, Suite 2030, Santa Ana, CA 92701-4593

**NOTICE OF POSSIBLE DIVIDEND AND
ORDER FIXING TIME TO FILE CLAIMS**

DEBTOR(S) INFORMATION:

Zia Shlaimoun
SSN: xxx-xx-1963
EIN: N/A

6789 Quail Hill Pkwy, Ste 414
Irvine, CA 92603

BANKRUPTCY NO. 8:17-bk-10976-TA
CHAPTER 7

Notice is hereby given that sufficient assets may become available for a distribution to creditors in the above-captioned bankruptcy case.

Therefore, in accordance with the provisions of Bankruptcy Rule 3002(c)(5), creditors must file their proofs of claim **on or before November 3, 2017**.

ANY CREDITOR WHO HAS PREVIOUSLY FILED A PROOF OF CLAIM NEED NOT FILE AGAIN.

A Proof of Claim form (Official Form 410) can be obtained at the United States Court's website:
(<http://www.uscourts.gov/FormsAndFees/Forms/BankruptcyForms.aspx>) or at any bankruptcy clerk's office.

Dated: July 31, 2017

For The Court,
Kathleen J. Campbell
Clerk of Court

Exhibit 2

Imaged Certificate of Notice Page 1 of 3
United States Bankruptcy Court
Central District of CaliforniaIn re:
Zia Shlaimoun
DebtorCase No. 17-10976-TA
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0973-8

User: cbeezerc
Form ID: ntcpdivPage 1 of 2
Total Noticed: 27

Date Rcvd: Jul 31, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 02, 2017.

db +Zia Shlaimoun, 6789 Quail Hill Pkwy, Ste 414, Irvine, CA 92603-4233
 aty +Law Offices of Thomas H Casey Inc a Professional C, 22342 Avenida Empresa Ste 200,
 Rancho Santa Margarita, CA 92688-2148
 cr +Amy Hsiao, c/o L. Scott Keehn, Keehn Law Group, APC, 501 W. Broadway, Ste. 1025,
 San Diego, CA 92101-3546
 cr +Daimler Trust, c/o BK Servicing, LLC, PO Box 131265, Roseville, MN 55113-0011
 cr +Hybrid Finance, LTD., Dillon Gerardi Hershberger Miller & Ahua, 5872 OWENS AVE STE 200,
 CARLSBAD, CA 92008-5518
 37671805 +Account Management Ser, 6101 Ball Rd Ste 207, Cypress, CA 90630-3965
 37671810 +Chase Auto, Po Box 901003, Ft Worth, TX 76101-2003
 37671812 +Designed Receivable So, 1 Centerpointe Dr Ste 45, La Palma, CA 90623-1052
 37694532 +Malibu Urgent Care, Acct Management Services, Inc, PO Box 2296, Cypress, CA 90630-1796
 37671815 +Mb Fin Svcs, 13650 Heritage Pkwy, Fort Worth, TX 76177-5323
 37671818 +Verizon Wireless, Po Box 49, Lakeland, FL 33802-0049

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

tr +EDI: FTHCASEY.COM Aug 01 2017 02:28:00 Thomas H Casey (TR),
 22342 Avenida Empresa, Suite 200, Rancho Santa Margarita, CA 92688-2148
 smg EDI: EDD.COM Aug 01 2017 02:28:00 Employment Development Dept., Bankruptcy Group MIC 92E,
 P.O. Box 826880, Sacramento, CA 94280-0001
 smg EDI: CALTAX.COM Aug 01 2017 02:28:00 Franchise Tax Board, Bankruptcy Section MS: A-340,
 P.O. Box 2952, Sacramento, CA 95812-2952
 cr +EDI: AISACG.COM Aug 01 2017 02:28:00 BMW Financial Services NA, LLC,
 c/o Ascension Capital Group, P.O. Box 165028, Irving, TX 75016,
 UNITED STATES 75016-5028
 37671806 +EDI: AMEREXPR.COM Aug 01 2017 02:28:00 Amex, P.O. Box 981537, El Paso, TX 79998-1537
 37671807 EDI: BANKAMER.COM Aug 01 2017 02:28:00 Bankamerica, Po Box 982238, El Paso, TX 79998
 37671808 EDI: BANKAMER.COM Aug 01 2017 02:28:00 Bk Of Amer, Po Box 982238, El Paso, TX 79998
 37671809 EDI: BMW.COM Aug 01 2017 02:28:00 Bmw Financial Services, 5515 Parkcenter Cir,
 Dublin, OH 43017
 37671811 +EDI: CHASE.COM Aug 01 2017 02:28:00 Chase Card, Po Box 15298, Wilmington, DE 19850-5298
 37671813 +EDI: TSYS2.COM Aug 01 2017 02:28:00 Dsnb Macys, 9111 Duke Blvd, Mason, OH 45040-8999
 37671814 +E-mail/Text: bknoticing@grantweber.com Aug 01 2017 02:28:48 Grant & Weber,
 26610 West Agoura Rd Ste, Calabasas, CA 91302-2975
 37671816 +E-mail/Text: bnc@nordstrom.com Aug 01 2017 02:28:34 Nordstrom/td, 13531 E Caley Ave,
 Englewood, CO 80111-6505
 37671817 +EDI: TFSR.COM Aug 01 2017 02:28:00 Toyota Motor Credit Co, 440 E Huntington Dr Ste,
 Arcadia, CA 91006-3776
 37798425 +EDI: AIS.COM Aug 01 2017 02:28:00 Verizon, by American InfoSource LP as agent,
 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901
 37671819 +EDI: WFFC.COM Aug 01 2017 02:28:00 Wells Fargo, Po Box 14517, Des Moines, IA 50306-3517
 37671820 +EDI: WFFC.COM Aug 01 2017 02:28:00 Wffnb Retail, Po Box 94498, Las Vegas, NV 89193-4498
 TOTAL: 16

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

intp Courtesy NEF

TOTALS: 1, * 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 02, 2017

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

District/off: 0973-8

User: cbeezerC
Form ID: ntcpdiv

Page 2 of 2
Total Noticed: 27

Date Rcvd: Jul 31, 2017

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 31, 2017 at the address(es) listed below:

Alan L. Armstrong on behalf of Interested Party Courtesy NEF alan@alanarmstrong.com
Charles Shamash on behalf of Debtor Zia Shlaimoun cs@locs.com, generalbox@locs.com
Eric V Anderton on behalf of Interested Party Courtesy NEF eanderton@catanzarite.com, bphillips@catanzarite.com
Kathleen J McCarthy on behalf of Trustee Thomas H Casey (TR) kdriggers@tomcaseylaw.com, msilva@tomcaseylaw.com
Scott L Keehn on behalf of Creditor Amy Hsiao scottk@keehnlaw.com, chrisf@keehnlaw.com
Scott L Keehn on behalf of Creditor Hybrid Finance, LTD. scottk@keehnlaw.com, chrisf@keehnlaw.com
Thomas H Casey on behalf of Trustee Thomas H Casey (TR) kdriggers@tomcaseylaw.com, msilva@tomcaseylaw.com
Thomas H Casey (TR) msilva@tomcaseylaw.com, thc@trustesolutions.net
Timothy J Silverman on behalf of Creditor BMW Financial Services NA, LLC tsilverman@scheerlawgroup.com
Timothy P Dillon on behalf of Creditor Amy Hsiao tdillon@dillongerardi.com, kramirez@dghmalaw.com
Timothy P Dillon on behalf of Creditor Hybrid Finance, LTD. tdillon@dillongerardi.com, kramirez@dghmalaw.com
United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov
Zann R Welch on behalf of Creditor BMW Financial Services NA, LLC ecfnofices@ascensioncapitalgroup.com

TOTAL: 13

**United States Bankruptcy Court
Central District of California**

411 West Fourth Street, Suite 2030, Santa Ana, CA 92701-4593

**NOTICE OF POSSIBLE DIVIDEND AND
ORDER FIXING TIME TO FILE CLAIMS**

DEBTOR(S) INFORMATION:

Zia Shlaimoun
SSN: xxx-xx-1963
EIN: N/A

6789 Quail Hill Pkwy, Ste 414
Irvine, CA 92603

**BANKRUPTCY NO. 8:17-bk-10976-TA
CHAPTER 7**

Notice is hereby given that sufficient assets may become available for a distribution to creditors in the above-captioned bankruptcy case.

Therefore, in accordance with the provisions of Bankruptcy Rule 3002(c)(5), creditors must file their proofs of claim on or before November 3, 2017.

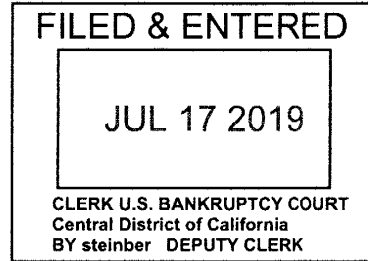
ANY CREDITOR WHO HAS PREVIOUSLY FILED A PROOF OF CLAIM NEED NOT FILE AGAIN.

A Proof of Claim form (Official Form 410) can be obtained at the United States Court's website:
(<http://www.uscourts.gov/FormsAndFees/Forms/BankruptcyForms.aspx>) or at any bankruptcy clerk's office.

Dated: July 31, 2017

For The Court,
Kathleen J. Campbell
Clerk of Court

Exhibit 3



UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

ZIA SHLAIMOUN

Debtor(s).

Case No.: 8:17-bk-10976-TA

CHAPTER 7

**ORDER REOPENING TIME FOR FILING
CLAIMS**

Date: July 16, 2019

Time: 11:00 a.m.

Courtroom: 5B

A hearing was held on the courts' "Status Conference re Notice Issues and Potential Reopening of Opportunity to File Claims" on the date and time stated above. Appearances were noted on the record. For the reasons stated on the record, the time for filing claims is reopened for a period of 60 days (measured from date of entry of this order) so that creditors who did not receive notice of the opportunity to file claims may do so. The Clerk's Office is instructed to issue such a notice.

Date: July 17, 2019

##

A handwritten signature in cursive script, reading "Theodor C. Albert".

Theodor C. Albert
United States Bankruptcy Judge

Exhibit 4

Imaged Certificate of Notice Page 1 of 4

United States Bankruptcy Court
Central District of CaliforniaIn re:
Zia Shlaimoun
DebtorCase No. 17-10976-TA
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0973-8

User: hcoronaC
Form ID: pdf002Page 1 of 3
Total Noticed: 78

Date Rcvd: Jul 18, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 20, 2019.

db +Zia Shlaimoun, 6789 Quail Hill Pkwy, Ste 414, Irvine, CA 92603-4233
 aty #+Law Offices of Thomas H Casey Inc a Professional C, 22342 Avenida Empresa Ste 200,
 Rancho Santa Margarita, CA 92688-2148
 aty +Michael Jason Lee, Law Offices of Michael Jason Lee, 4660 La Jolla Village Dr, Ste 100,
 San Diego, CA 92122-4604
 aty +Sunjina Kaur Anand Ahuja, Dillon Gerardi Hershberger Miller Ahuja, 5872 Owens Avenue,
 Ste 200, Carlsbad, CA 92008-5518
 cr +Amy Hsiao, c/o L. Scott Keehn, Keehn Law Group, APC, 501 W. Broadway, Ste. 1025,
 San Diego, CA 92101-3546
 cr +Catanzarite Law Corporation, Catanzarite Law Corporation, 2331 W. Lincoln Ave.,
 Anaheim, CA 92801-5132
 cr +Daimler Trust, c/o BK Servicing, LLC, PO Box 131265, Roseville, MN 55113-0011
 acc +Hahn Fife & Company, 790 E Colorado Blvd 9th Fl, Pasadena, CA 91101-2193
 cr +Hybrid Finance, LTD., Dillon Gerardi Hershberger Miller & Ahua, 5872 OWENS AVE STE 200,
 CARLSBAD, CA 92008-5518
 39621147 +561 Limited Liability Company, 561 Andrews Avenue, Youngstown, OH 44505-3064
 37671805 +Account Management Ser, 6101 Ball Rd Ste 207, Cypress, CA 90630-3965
 38003661 American Express Centurion Bank, c/o Becket and Lee LLP, PO Box 3001,
 Malvern PA 19355-0701
 39621149 +Amex, Correspondence, Po Box 981540, El Paso, TX 79998-1540
 37671806 +Amex, P.O. Box 981537, El Paso, TX 79998-1537
 39621150 +Amy Hsaio, c/o Michael Jason Lee, 4660 La Jolla Village Drive Suite 500,
 San Diego, CA 92122-4605
 38153497 +Amy Hsiao, c/o L Scott Keehn Esq, 501 W Broadway Ste 1025, San Diego, CA 92101-3546
 39621151 +Anne Tahim, 2331 West Lincoln Avenue Suite 300, Anaheim, CA 92801-5103
 37671807 ++BANK OF AMERICA, PO BOX 982238, EL PASO TX 79998-2238
 (address filed with court: Bankamerica, Po Box 982238, El Paso, TX 79998)
 39621154 +Buchalter Nemer, 1000 Wilshire Boulevard Suite 1500, Los Angeles 90017-1730
 38155574 +Catanzarite Law Corporation, 2331 West Lincoln Avenue, Anaheim, CA 92801-5132
 39621155 +Charles & Stephanie Begin, c/o Mark Hankin Etess, 1562 Glen Oaks Blvd Floor 2,
 Pasadena, CA 91105-1009
 39621146 +Charles Shamash, Caceres & Shamash, LLP, 8200 Wilshire Boulevard Suite 400,
 Beverly Hills, CA 90211-2315
 37671810 +Chase Auto, Po Box 901003, Ft Worth, TX 76101-2003
 39621156 Chase Auto Finance, National Bankruptcy Dept, 201 N Central Ave Ms Az1-1191,
 Phoenix, AZ 85004
 37671811 +Chase Card, Po Box 15298, Wilmington, DE 19850-5298
 39621157 +Chase Card, Attn: Correspondence Dept, Po Box 15298, Wilmington, DE 19850-5298
 37671812 +Designed Receivable So, 1 Centerpointe Dr Ste 45, La Palma, CA 90623-1052
 39621158 +Designed Receivable Solutionsr Inc. /DRS, 1 Centerpointe Drive, Suite 450,
 La Palma, CA 90623-1052
 37671813 +Dsnb Macys, 9111 Duke Blvd, Mason, OH 45040-8999
 39621163 Garcia Jensen, 5 Olders Avenue, Woodford Green, Essex - England
 39621164 +George Eshoo, 702 Marshall Street Suite 500, Redwood City, CA 94063-1826
 39628389 +George P. Eshoo, 702 Marshall St, Ste 500, Redwood City, CA 94063-1826
 39621166 +Heyde Management, LLC, c/o The Maune Company, 7711 Bonhomme Avenue Suite 310,
 Saint Louis MO 63105-1908
 39621167 +Hybrid Finance, Ltd., c/o Sunjina K. Ahuja, 5872 Owens Avenue Suite 200,
 Carlsbad 92008-5518
 38154493 +Hybrid Finance, Ltd., c/o Michael J. Lee, Law Offices of Michael Jason Lee, APLC,
 4660 La Jolla Village Drive, Suite 500, San Diego, CA 92122-4605
 39621169 +Irvine Water, 15600 Sand Canyon Avenue, Irvine, CA 92618-3102
 39621170 +Karin Gurwell, 7755 Center Avenue Suite 1100, Huntington Beach, CA 92647-3091
 37694532 +Malibu Urgent Care, Acct Management Services, Inc, PO Box 2296, Cypress, CA 90630-1796
 39621171 Medicare, 7500 Security Boulevard, Windsor Mill, MD 21244-1850
 39621173 +Mylab Diagnostics, LLC, 448 Sovereign Court, Unit B, Ballwin 63011-4445
 38038549 +Southern California Edison, 1551 W San Bernardino Rd, Covina, CA 91722-3407
 39621175 +Southern California Edison, 1721 22nd Street, Santa Monica, CA 90404-3920
 39621176 +Southern California Gas Company, P.O. Box C, Monterey Park CA 91756-0001
 39621177 Suzan Shamoon, 566 Chiswick High Road, London W4 5YA, England
 39621178 ++TOYOTA MOTOR CREDIT CORPORATION, PO BOX 8026, CEDAR RAPIDS IA 52408-8026
 (address filed with court: Toyota Motor credit Corp, Po Box 8026, Cedar Rapids, IA 52408)
 37671817 +Toyota Motor Credit Co, 440 E Huntington Dr Ste, Arcadia, CA 91006-3776
 39621179 +US Attorney's Office Civil Process, 300 North Los Angeles Street,
 Federal Building Room 7516, Los Angeles, CA 90012-3308
 39621180 +USDOJ Attorney General, P.O. Box 683, Ben Franklin Station, Washington, DC 20044-0683
 39621183 +Visa Dept Store National Bank/Macy's, Attn: Bankruptcy, Po Box 8053, Mason, OH 45040-8053
 37671819 +Wells Fargo, Po Box 14517, Des Moines, IA 50306-3517
 39621184 +Wells Fargo Bank Card, Mac F82535-02f, Po Box 10438, Des Moines, IA 50306-0438
 38015486 Wells Fargo Bank, N.A., PO Box 10438, MAC F8235-02F, Des Moines, IA 50306-0438
 38003927 Wells Fargo Bank, N.A., Wells Fargo Card Services, PO Box 10438, MAC F8235-02F,
 Des Moines, IA 50306-0438
 39621185 Wffnb Retail, Csc1 Dispute Team, Des Moines, IA 50306
 37671820 +Wffnb Retail, Po Box 94498, Las Vegas, NV 89193-4498

District/off: 0973-8

User: hcoronaC
Form ID: pdf002Page 2 of 3
Total Noticed: 78

Date Rcvd: Jul 18, 2019

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center (continued)

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

smg E-mail/Text: itcdbg@edd.ca.gov Jul 19 2019 03:24:50 Employment Development Dept.,
Bankruptcy Group MIC 92E, P.O. Box 826880, Sacramento, CA 94280-0001

smg E-mail/Text: BKBNCNotices@ftb.ca.gov Jul 19 2019 03:25:44 Franchise Tax Board,
Bankruptcy Section MS: A-340, P.O. Box 2952, Sacramento, CA 95812-2952

cr +E-mail/PDF: acg.acg.ebn@americaninfosource.com Jul 19 2019 03:47:36
BMW Bank of North America, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901

cr +E-mail/PDF: acg.acg.ebn@americaninfosource.com Jul 19 2019 03:49:46
BMW Financial Services NA, LLC, c/o Ascension Capital Group, P.O. Box 165028,
Irving, TX 75016, UNITED STATES 75016-5028

38206348 E-mail/PDF: ais.bmw.ebn@americaninfosource.com Jul 19 2019 03:48:53
BMW Financial Services NA, LLC, P.O. Box 3608, Dublin OH 43016, OH 43016

37671809 E-mail/PDF: ais.bmw.ebn@americaninfosource.com Jul 19 2019 03:47:45 Bmw Financial Services,
5515 Parkcenter Cir, Dublin, OH 43017

39621153 E-mail/PDF: ais.bmw.ebn@americaninfosource.com Jul 19 2019 03:47:47 Bmw Financial Services,
Attn: Bankruptcy Department, Po Box 3608, Dublin, OH 43016

38675795 +E-mail/PDF: acg.acg.ebn@americaninfosource.com Jul 19 2019 03:48:42
BMW Financial Services NA, LLC, 4515 N. Santa Fe Ave., APS, Oklahoma City, OK 73118-7901

39621159 E-mail/Text: itcdbg@edd.ca.gov Jul 19 2019 03:24:50 Employment Development Department,
P.O. Box 826806, Bankruptcy Group MIC 92E, Sacramento, CA 94206-0001

39621160 +E-mail/Text: BKBNCNotices@ftb.ca.gov Jul 19 2019 03:25:44 Franchise Tax Board,
P.O. Box 1673, Bankruptcy Unit, Sacramento, CA 95812-1673

39621161 E-mail/Text: BKBNCNotices@ftb.ca.gov Jul 19 2019 03:25:44 Franchise Tax Board,
P.O. Box 2952, Bankruptcy Section, MS: A-340, Sacramento, CA 95812-2952

39621162 E-mail/Text: BKBNCNotices@ftb.ca.gov Jul 19 2019 03:25:44 Franchise Tax Board,
P.O. Box 1720, MS: A-260, c/o General Counsel Section, Rancho Cordova, CA 95741-1720

39621165 +E-mail/Text: bknoticing@grantweber.com Jul 19 2019 03:24:58 Grant & Weber,
Attn: Bankruptcy, 26575 W Agoura Rd, Calabasas, CA 91302-1958

37671814 +E-mail/Text: bknoticing@grantweber.com Jul 19 2019 03:24:58 Grant & Weber,
26610 West Agoura Rd Ste, Calabasas, CA 91302-2975

39621168 E-mail/Text: cio.bncmail@irs.gov Jul 19 2019 03:24:39 Internal Revenue Service,
P.O. Box 7346, Centralized Bankruptcy, Philadelphia, PA 19101-7346

37671815 +E-mail/Text: M74banko@daimler.com Jul 19 2019 03:25:41 Mb Fin Svcs, 13650 Heritage Pkwy,
Fort Worth, TX 76177-5323

39621172 +E-mail/Text: M74banko@daimler.com Jul 19 2019 03:25:41 Mercedes-Benz Financial,
Po Box 685, Roanoke, TX 76262-0685

39621174 +E-mail/Text: bnc@nordstrom.com Jul 19 2019 03:24:35 Nordstrom Fsb, Correspondence,
Po Box 6555, Englewood, CO 80155-6555

37671816 +E-mail/Text: bnc@nordstrom.com Jul 19 2019 03:24:35 Nordstrom/td, 13531 E Caley Ave,
Englewood, CO 80111-6505

39621182 E-mail/Text: wfmelectronicbankruptcynotifications@verizonwireless.com Jul 19 2019 03:23:19
Verizon, P.O. Box 920041, Dallas, TX 75392-0041

39621181 +E-mail/Text: wfmelectronicbankruptcynotifications@verizonwireless.com Jul 19 2019 03:23:19
Verizon, Verizon Wireless Bankruptcy Administrati, 500 Tecnolgy Dr Ste 500,
Weldon Springs, MO 63304-2225

37798425 +E-mail/PDF: EBN AIS@AMERICANINFOSOURCE.COM Jul 19 2019 03:50:17 Verizon,
by American InfoSource LP as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901

37671818 +E-mail/Text: wfmelectronicbankruptcynotifications@verizonwireless.com Jul 19 2019 03:23:19
Verizon Wireless, Po Box 49, Lakeland, FL 33802-0049

TOTAL: 23

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

intp Courtesy NEF
cr JPMorgan Chase Bank, N.A.
acc* +Hahn Fife & Company, LLP, 790 E Colorado Blvd 9th Fl, Pasadena, CA 91101-2193
39621148* +Account Management Ser, 6101 Ball Rd Ste 207, Cypress, CA 90630-3965
37671808* ++BANK OF AMERICA, PO BOX 982238, EL PASO TX 79998-2238
(address filed with court: Bk Of Amer, Po Box 982238, El Paso, TX 79998)
39621145* +Zia Shlaimoun, 6789 Quail Hill Parkway, Suite 414, Irvine, CA 92603-4233
39621152 ##+Bank Of America, Nc4-105-03-14, Po Box 26012, Greensboro, NC 27420-6012

TOTALS: 2, * 4, ## 1

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '++' were redirected to the recipient's preferred mailing address pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update. While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

EXHIBIT 4 PAGE 23

District/off: 0973-8

User: hcoronaC
Form ID: pdf002

Page 3 of 3
Total Noticed: 78

Date Rcvd: Jul 18, 2019

***** BYPASSED RECIPIENTS (continued) *****

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 20, 2019

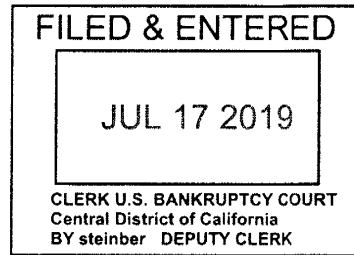
Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 18, 2019 at the address(es) listed below:

Alan L. Armstrong on behalf of Interested Party Courtesy NEF alan@alanarmstrong.com
Charles Shamash on behalf of Debtor Zia Shlaimoun cs@locs.com, generalbox@locs.com
David B Shemano on behalf of Defendant Zia Shlaimoun dshemano@shemanolaw.com
David B Shemano on behalf of Debtor Zia Shlaimoun dshemano@shemanolaw.com
Dipika Parmar on behalf of Creditor BMW Bank of North America dipika.parmar@aissolution.com
Eric V Anderton on behalf of Interested Party Courtesy NEF eanderton@catanzarite.com,
bphillips@catanzarite.com
Eric V Anderton on behalf of Creditor Catanzarite Law Corporation eanderton@catanzarite.com,
bphillips@catanzarite.com
Jamie D Hanawalt on behalf of Creditor JPMorgan Chase Bank, N.A. ecfcacb@aldridgepite.com,
jhanawalt@ecf.inforuptcy.com
Jamie D Hanawalt on behalf of Interested Party Courtesy NEF ecfcacb@aldridgepite.com,
jhanawalt@ecf.inforuptcy.com
Kathleen J McCarthy on behalf of Trustee Thomas H Casey (TR) kdriggers@tomcaseylaw.com,
msilva@tomcaseylaw.com
Michael J Lee on behalf of Plaintiff Hybrid, LTD. michael@mjllaw.com
Michael J Lee on behalf of Plaintiff Thomas H Casey michael@mjllaw.com
Michael J Lee on behalf of Plaintiff Thomas H. Casey, Trustee of the Zia Shlaimoun Ch. 7
Bankruptcy Estate michael@mjllaw.com
Michael J Lee on behalf of Creditor Hybrid Finance, LTD. michael@mjllaw.com
Scott L Keehn on behalf of Creditor Amy Hsiao scottk@keehnlaw.com, chrisf@keehnlaw.com
Scott L Keehn on behalf of Creditor Hybrid Finance, LTD. scottk@keehnlaw.com,
chrisf@keehnlaw.com
Thomas H Casey on behalf of Trustee Thomas H Casey (TR) kdriggers@tomcaseylaw.com,
msilva@tomcaseylaw.com
Thomas H Casey (TR) msilva@tomcaseylaw.com, thc@trustesolutions.net
Timothy J Silverman on behalf of Creditor BMW Financial Services NA, LLC
tsilverman@scheerlawgroup.com
Timothy P Dillon on behalf of Plaintiff Hybrid, LTD. tdillon@dghmalaw.com,
ksauser@dghmalaw.com
Timothy P Dillon on behalf of Creditor Amy Hsiao tdillon@dghmalaw.com, ksauser@dghmalaw.com
Timothy P Dillon on behalf of Creditor Hybrid Finance, LTD. tdillon@dghmalaw.com,
ksauser@dghmalaw.com
United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
Zann R Welch on behalf of Creditor BMW Financial Services NA, LLC
ecfnotices@ascensioncapitalgroup.com

TOTAL: 24



UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

ZIA SHLAIMOUN

Debtor(s).

Case No.: 8:17-bk-10976-TA

CHAPTER 7

**ORDER REOPENING TIME FOR FILING
CLAIMS**

Date: July 16, 2019

Time: 11:00 a.m.

Courtroom: 5B

A hearing was held on the courts' "Status Conference re Notice Issues and Potential Reopening of Opportunity to File Claims" on the date and time stated above. Appearances were noted on the record. For the reasons stated on the record, the time for filing claims is reopened for a period of 60 days (measured from date of entry of this order) so that creditors who did not receive notice of the opportunity to file claims may do so. The Clerk's Office is instructed to issue such a notice.

##

Theodor C. Albert
United States Bankruptcy Judge

Date: July 17, 2019

Exhibit 5

Fill in this information to identify the case:

Debtor 1	Zia Shlaimoun
Debtor 2	
(Spouse, if filing)	
United States Bankruptcy Court	Central District of California
Case number:	17-10976

FILED
U.S. Bankruptcy Court
Central District of California
6/20/2019
Kathleen J. Campbell, Clerk

**Official Form 410
Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	George P. Eshoo Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor Law Offices of George P. Eshoo	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? George P. Eshoo Name 702 Marshall St Ste 500 Redwood City, CA 94063 Contact phone 650-364-7030 Contact email georgeeshoo@aol.com Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) _____ Name _____ Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Official Form 410

Proof of Claim

page 1

Part 2: Give Information About the Claim as of the Date the Case Was Filed**6. Do you have any number you use to identify the debtor?**

- ☒ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim?

\$ 551798.43

Does this amount include interest or other charges?

- ☐ No
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as healthcare information.

Legal services [Feb 2, 2015 to July 31, 2018], hard costs advanced and interest on unpaid balance to June 20, 2019.

9. Is all or part of the claim secured?

- ☒ No
☐ Yes. The claim is secured by a lien on property.

Nature of property:

- ☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____

Basis for perfection:

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property:

\$ _____

Amount of the claim that is secured:

\$ _____

Amount of the claim that is unsecured:

\$ _____

(The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition:

\$ _____

Annual Interest Rate (when case was filed)

_____%

- ☐ Fixed
☐ Variable

10. Is this claim based on a lease?

- ☒ No
☐ Yes. **Amount necessary to cure any default as of the date of the petition.** \$ _____

11. Is this claim subject to a right of setoff?

- ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply:</i>	Amount entitled to priority
<p>A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.</p>	<div style="margin-bottom: 5px;"><input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____</div> <div style="margin-bottom: 5px;"><input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(_) that applies \$ _____</div>	
* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.		

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 6/20/2019
 MM / DD / YYYY

/s/ George P. Eshoo, Esq

 Signature

Print the name of the person who is completing and signing this claim:

Name	<u>George P. Eshoo, Esq</u>		
	First name	Middle name	Last name
Title	<u>Attorney [CBN 39081]</u>		
Company	<u>Law Offices of George P. Eshoo</u>		
Address	Identify the corporate servicer as the company if the authorized agent is a servicer		
	<u>702 Marshasll St, Ste 500</u>		
	Number Street		
	<u>Redwood City, CA 94063</u>		
	City State ZIP Code		
Contact phone	<u>650-364-7030</u>	Email	<u>georgeeshoo@aol.com</u>

Case Number: 8:17-bk-10976-TA	702 Marshall St Ste 500
Debtor: Zia Shlaimoun	Redwood City CA 94063
Creditor: Law Offices of George P. Eshoo	650-364-7030
ShlaimounZ_HRLY/Catz/Paya/APL/Oussha/Misc	georgeeshoo@aol.com
Attorney Fees [Feb. 2, 2015 to July 31, 2018]	\$428,252.30
Costs	data pending
Interest [10% per annum; 30 days grace; June 20, 2019]	\$123,546.13
Total [Interest is ongoing]	\$551,798.43

Exhibit 6

From: [Marissa Silva](#)
To: georgeeshoo@aol.com
Cc: [Tom Casey](#)
Bcc: [Jennifer Gregory](#)
Subject: Shlaimoun, Zia / 8:17-bk-10976-TA
Date: Monday, November 1, 2021 5:07:58 PM
Attachments: [Claim No 12 - George Eshoo 062019.pdf](#)
[Claim No 13 - George Eshoo 071819.pdf](#)

Mr. Eshoo,

Thomas H. Casey, Chapter 7 Trustee for the bankruptcy estate of Zia Shlaimoun, is commencing the case closing process and is reviewing all filed proof of claims. It appears that your law office has filed two proof of claims, claim numbers 12 and 13, copies of both claims are attached. It is my understanding that you represented individual Debtor Zia Shlaimoun and Versailles Investments, LLC in pre-petition litigation in the Orange County Superior Court.

It appears that while the dollar amounts are different, claim numbers 12 and 13 are duplicative of one another. In addition, each filed claim is requesting attorneys' fees and interest after the bankruptcy petition date of March 15, 2017. Please be advised that any legal fees or interest accrued beyond the petition date of March 15, 2017, are not allowed. In addition, neither claim number 12 or 13 contain any backup documentation supporting the claim.

Accordingly, within seven (7) days of the date of this email, the Trustee is requesting that you 1) file, in the US Bankruptcy Court, a withdrawal of duplicate claim number 13; and 2) provide back-up documentation to the undersigned to support claim number 12, such back-up documents may include, but are not limited to, a fully executed retainer agreement and redacted time entries for your representation of individual debtor Zia Shlaimoun.

If our office does not receive a timely response, the Trustee will file formal objections to both claims.

Thank you and I look forward to hearing from you.

Marissa Silva

Marissa Silva
Paralegal / Trustee Administrator
The Law Offices of Thomas H. Casey, Inc.
26400 La Alameda, Suite 210
Mission Viejo, CA 92691
Phone: (949) 766-8787, ext. 100
Fax: (949) 766-9896

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error, please notify us immediately by telephone at (949)766-8787 and return the original message to the sender at the above address. Nothing in this communication is intended to operate as an electronic signature under applicable law.

Exhibit 7

LAW OFFICES OF GEORGE P. ESHOO 702 Marshall Street, Suite 500 Redwood City, CA 94063	
TELEPHONE: (650) 364-7030 FACSIMILE: (650) 364-7033 EMAIL: georgeeshoo@aol.com	GEORGE P. ESHOO November 4, 2021

Thomas H. Casey [CBN138264]
22342 Avenida Empresa, Ste 245,
Rancho Santa Margarita, CA 92688
(w) (949) 766-8787; (f) 9490766-9896
(e) tomcasey@tomcaseylaw.com
(e) msilva@tomcaseylaw.com

VIA U.S. MAIL AND [COURTESY] EMAIL

RE: Shlaimoun, Zia / 8:17-bk-10976-TA
Eshoo Claim #12 (6/20/2019; \$551,798.43) and Claim #13 (7/18/2019; \$615,229.02)

Dear Tom,

I am in receipt of email from Marissa Silva, Paralegal dated Nov. 1, 2021 that attached Claim #12 and Claim #13. Kindly note Claim #13 filed after the Order dated July 17, 2019 (Dkt. 228) that states, "A hearing was held on the courts' "Status Conference re Notice Issues and Potential Reopening of Opportunity to File Claims"... For the reasons stated on the record, the time for filing claims is reopened for a period of 60 days (measured from date of entry of this order) so that creditors who did not receive notice of the opportunity to file claims may do so..."

Claimant Eshoo intended Claim #13 to replace Claim #12. This is noted in the Remarks in the Claims Registry at each Claim #12 and Claim #13 as noted below:

(#12) Filer Comment: Discovered omission from service on June 17 2019.

(#13) Filer Comment: CLAIM 12 REPLACED IN CLAIM PERIOD PER ORDER JULY 17 2019

However, we recall that you (a) already asked the same question in 2019 or 2020; (b) were not satisfied with the response; and (c) unilaterally withdrew one of the two Claims. The Claim Nbr. that was removed is not resolved by the case registry nor prior email correspondence, and I will not guess while at risk of removing the sole remaining Claim.

Again, Claimant intended Claim #13 to replace Claim #12 as noted in the Remarks on the Claims Registry. If you erred in any way such as removed the wrong Claim, then the error(s) need(s) to be repaired so that the Law Office Claim remains intact without e.g. any reduction in priority nor introduction of other prejudice. Thank you, Tom.

Sincerely,
LAW OFFICES OF GEORGE P. ESHOO

By: 
George P. Eshoo, Esq.

enc: Email from msilva@tomcaseylaw.com; Order (Dkt 228); Claim Registry.

ESHOO LTR TO CASEY, ATTY FOR BKCY-TR RE: SHLAIMOUN [817BK10976TA]

1

From: msilva@tomcaseylaw.com,
To: georgeeshoo@aol.com,
Cc: tomcasey@tomcaseylaw.com,
Subject: Shlaimoun, Zia / 8:17-bk-10976-TA
Date: Mon, Nov 1, 2021 5:07 pm

Attachments: Claim No 12 - George Eshoo 062019.pdf (75K), Claim No 13 - George Eshoo 071819.pdf (81K)

Mr. Eshoo,

Thomas H. Casey, Chapter 7 Trustee for the bankruptcy estate of Zia Shlaimoun, is commencing the case closing process and is reviewing all filed proof of claims. It appears that your law office has filed two proof of claims, claim numbers 12 and 13, copies of both claims are attached. It is my understanding that you represented individual Debtor Zia Shlaimoun and Versailles Investments, LLC in pre-petition litigation in the Orange County Superior Court.

It appears that while the dollar amounts are different, claim numbers 12 and 13 are duplicative of one another. In addition, each filed claim is requesting attorneys' fees and interest after the bankruptcy petition date of March 15, 2017. Please be advised that any legal fees or interest accrued beyond the petition date of March 15, 2017, are not allowed. In addition, neither claim number 12 or 13 contain any backup documentation supporting the claim.

Accordingly, within seven (7) days of the date of this email, the Trustee is requesting that you 1) file, in the US Bankruptcy Court, a withdrawal of duplicate claim number 13; and 2) provide back-up documentation to the undersigned to support claim number 12, such back-up documents may include, but are not limited to, a fully executed retainer agreement and redacted time entries for your representation of individual debtor Zia Shlaimoun.

If our office does not receive a timely response, the Trustee will file formal objections to both claims.

Thank you and I look forward to hearing from you.

Marissa Silva

Marissa Silva

Paralegal / Trustee Administrator

The Law Offices of Thomas H. Casey, Inc.

EXHIBIT 7 PAGE 33

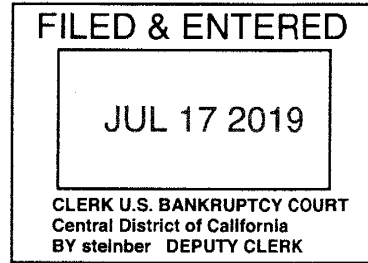
26400 La Alameda, Suite 210

Mission Viejo, CA 92691

Phone: (949) 766-8787, ext. 100

Fax: (949) 766-9896

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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

ZIA SHLAIMOUN

Debtor(s).

Case No.: 8:17-bk-10976-TA

CHAPTER 7

**ORDER REOPENING TIME FOR FILING
CLAIMS**

Date: July 16, 2019

Time: 11:00 a.m.

Courtroom: 5B

A hearing was held on the courts' "Status Conference re Notice Issues and Potential Reopening of Opportunity to File Claims" on the date and time stated above. Appearances were noted on the record. For the reasons stated on the record, the time for filing claims is reopened for a period of 60 days (measured from date of entry of this order) so that creditors who did not receive notice of the opportunity to file claims may do so. The Clerk's Office is instructed to issue such a notice.

Date: July 17, 2019

##

A handwritten signature in cursive script, reading "Theodor C. Albert".

Theodor C. Albert
United States Bankruptcy Judge

Central District of California Claims Register

8:17-bk-10976-TA Zia Shlaimoun **Converted** 03/28/2017

Judge: Theodor Albert

Chapter: 7

Office: Santa Ana

Last Date to file claims: 09/16/2019

Trustee: Thomas H Casey (TR)

Last Date to file (Govt): 09/11/2017

Creditor: (37694532)
Malibu Urgent Care
Acct Management Services, Inc
PO Box 2296
Cypress, CA 90630

Claim No: 1
Original Filed
Date: 03/24/2017
Original Entered
Date: 03/27/2017

Status:
Filed by: CR
Entered by: Sally Daniels
Modified:

Amount claimed: \$333.30

History:

Details 1-1 03/24/2017 Claim #1 filed by Malibu Urgent Care, Amount claimed: \$333.30 (Daniels, Sally)

Description:

Remarks:

Creditor: (37798425)
Verizon
by American InfoSource LP as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

Claim No: 2
Original Filed
Date: 05/12/2017
Original Entered
Date: 05/12/2017

Status:
Filed by: CR
Entered by: Ashley Boswell
Modified:

Amount claimed: \$2224.35

History:

Details 2-1 05/12/2017 Claim #2 filed by Verizon, Amount claimed: \$2224.35 (Boswell, Ashley)

Description:

Remarks:

Creditor: (38003661)
American Express Centurion Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Claim No: 3
Original Filed
Date: 08/18/2017
Original Entered
Date: 08/18/2017

Status:
Filed by: CR
Entered by: Greg Deegan
Modified:

Amount claimed: \$29652.07

History:

Details 3-1 08/18/2017 Claim #3 filed by American Express Centurion Bank, Amount claimed: \$29652.07 (Deegan, Greg)

Description:

Remarks:

Creditor: (38003927)
Wells Fargo Bank, N.A.

Claim No: 4
Original Filed

Status:
Filed by: CR

11/2/21, 10:27 AM

Main Document Page 47 of 70

CM/ECF - U.S. Bankruptcy Court (v.1.5.3 - LIVE)

Wells Fargo Card Services
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Date: 08/18/2017
Original Entered
Date: 08/18/2017

Entered by: Janet L Samuelson
Modified:

Amount claimed: \$1221.69

History:

Details 4-1 08/18/2017 Claim #4 filed by Wells Fargo Bank, N.A., Amount claimed: \$1221.69 (Samuelson, Janet)

Description:

Remarks:

Creditor: (38015486)
Wells Fargo Bank, N.A.
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Claim No: 5
Original Filed
Date: 08/24/2017
Original Entered
Date: 08/24/2017

Status:
Filed by: CR
Entered by: Trang Truong
Modified:

Amount claimed: \$2137.71

History:

Details 5-1 08/24/2017 Claim #5 filed by Wells Fargo Bank, N.A., Amount claimed: \$2137.71 (Truong, Trang)

Description: (5-1) unsecured claim

Remarks:

Creditor: (38038549)
Southern California Edison
1551 W San Bernardino Rd
Covina, CA 91722

Claim No: 6
Original Filed
Date: 09/01/2017
Original Entered
Date: 09/05/2017

Status:
Filed by: CR
Entered by: Sally Daniels
Modified:

Amount claimed: \$433.24

History:

Details 6-1 09/01/2017 Claim #6 filed by Southern California Edison, Amount claimed: \$433.24 (Daniels, Sally)

Description:

Remarks:

Creditor: (38038549)
Southern California Edison
1551 W San Bernardino Rd
Covina, CA 91722

Claim No: 7
Original Filed
Date: 09/01/2017
Original Entered
Date: 09/05/2017

Status:
Filed by: CR
Entered by: Sally Daniels
Modified:

Amount claimed: \$2372.46

History:

Details 7-1 09/01/2017 Claim #7 filed by Southern California Edison, Amount claimed: \$2372.46 (Daniels, Sally)

Description:

Remarks:

Creditor: (38153497)
Amy Hsiao
c/o L Scott Keehn Esq

Claim No: 8
Original Filed
Date: 11/03/2017

Status:
Filed by: CR

11/2/21, 10:27 AM

Main Document Page 48 of 70

CM/ECF - U.S. Bankruptcy Court (v.1.53 - LIVE)

501 W Broadway Ste 1025
San Diego, CA 92101

Original Entered
Date: 11/03/2017

Entered by: Scott L Keehn
Modified:

Amount claimed: \$231296.41

History:

Details 8-1 11/03/2017 Claim #8 filed by Amy Hsiao, Amount claimed: \$231296.41 (Keehn, Scott)

Description:

Remarks:

Creditor: (38154493)
Hybrid Finance, Ltd.
c/o Michael J. Lee
Law Offices of Michael Jason Lee, APLC
4660 La Jolla Village Drive, Suite 500
San Diego, CA 92122

Claim No: 9
Original Filed
Date: 11/03/2017
Original Entered
Date: 11/03/2017

Status:
Filed by: CR
Entered by: Michael J Lee
Modified:

Amount claimed: \$2661457.00

History:

Details 9-1 11/03/2017 Claim #9 filed by Hybrid Finance, Ltd., Amount claimed: \$2661457.00 (Lee, Michael)

Description:

Remarks:

Creditor: (38155574)
Catanzarite Law Corporation
2331 West Lincoln Avenue
Anaheim, CA 92801

Claim No: 10
Original Filed
Date: 11/03/2017
Original Entered
Date: 11/03/2017

Status: Withdraw 243
Filed by: CR
Entered by: Eric V Anderton
Modified:

Amount claimed: \$300000.00

Secured claimed: \$300000.00

History:

Details 10-1 11/03/2017 Claim #10 filed by Catanzarite Law Corporation, Amount claimed: \$300000.00 (Anderton, Eric)

243 05/27/2021 Withdrawal of Claim(s): 10 Filed by Creditor Catanzarite Law Corporation. (Catanzarite, Keneth) Status: Withdraw

Description: (10-1) Undetermined Value - Litigation Claims

Remarks:

Creditor: (38206348)
BMW Financial Services NA, LLC
P.O. Box 3608
Dublin OH 43016, OH 43016

Claim No: 11
Original Filed
Date: 11/29/2017
Original Entered
Date: 11/29/2017

Status:
Filed by: CR
Entered by: Rejoy Nalkara
Modified:

Amount claimed: \$20728.33

History:

Details 11-1 11/29/2017 Claim #11 filed by BMW Financial Services NA, LLC, Amount claimed: \$20728.33 (Nalkara, Rejoy)

Description:

Remarks:

11/2/21, 10:27 AM

Main Document Page 49 of 70

CM/ECF - U.S. Bankruptcy Court (v.1.5.3 - LIVE)

Creditor: (39628389)
 George P. Eshoo
 702 Marshall St
 Ste 500
 Redwood City, CA 94063

Claim No: 12
Original Filed
Date: 06/20/2019
Original Entered
Date: 06/20/2019

Status:
Filed by: CR
Entered by: ePOC-User AutoDocket
Modified:

Amount claimed: \$551798.43

History:

Details 12-1 06/20/2019 Claim #12 filed by George P. Eshoo, Amount claimed: \$551798.43 (AutoDocket, ePOC-User)

Description:

Remarks: (12-1) Filer Comment: Discovered omission from service on June 17 2019.

Creditor: (39628389)
 George P. Eshoo
 702 Marshall St
 Ste 500
 Redwood City, CA 94063

Claim No: 13
Original Filed
Date: 07/18/2019
Original Entered
Date: 07/18/2019

Status:
Filed by: CR
Entered by: ePOC-User AutoDocket
Modified:

Amount claimed: \$615229.02

History:

Details 13-1 07/18/2019 Claim #13 filed by George P. Eshoo, Amount claimed: \$615229.02 (AutoDocket, ePOC-User)

Description:

Remarks: (13-1) Filer Comment: CLAIM 12 REPLACED IN CLAIM PERIOD PER ORDER JULY 17 2019

Creditor: (39752230)
Buchalter, A Professional Corporation
 Attn: Pamela Kohlman Webster
 1000 Wilshire Blvd., Suit 1500
 Los Angeles, CA 90017

Claim No: 14
Original Filed
Date: 08/20/2019
Original Entered
Date: 08/20/2019

Status:
Filed by: CR
Entered by: ePOC-User AutoDocket
Modified:

Amount claimed: \$37780.53

History:

Details 14-1 08/20/2019 Claim #14 filed by Buchalter, A Professional Corporation, Amount claimed: \$37780.53 (AutoDocket, ePOC-User)

Description:

Remarks: (14-1) Account Number (last 4 digits):1317

Creditor: (39802045)
Tahim And Association, APC
 2331 w Lincoln Ave, Suite 300
 Anaheim CA 92801

Claim No: 15
Original Filed
Date: 09/12/2019
Original Entered
Date: 09/13/2019

Status:
Filed by: CR
Entered by: Glenda Deramus
Modified:

Amount claimed: \$6125.00

History:

Details 15-1 09/12/2019 Claim #15 filed by Tahim And Association, APC, Amount claimed: \$6125.00 (Deramus, Glenda)

Description: (15-1) SERVICES PERFORMED

Remarks:

Claims Register Summary

Case Name: Zia Shlaimoun
Case Number: 8:17-bk-10976-TA
Chapter: 7
Date Filed: 03/15/2017
Total Number Of Claims: 15

Total Amount Claimed*	\$4462789.54
Total Amount Allowed*	

*Includes general unsecured claims

The values are reflective of the data entered. Always refer to claim documents for actual amounts.

	Claimed	Allowed
Secured	\$300000.00	
Priority		
Administrative		

PACER Service Center			
Transaction Receipt			
11/02/2021 10:24:26			
PACER Login:	georgeeshoo	Client Code:	
Description:	Claims Register	Search Criteria:	8:17-bk-10976-TA Filed or Entered From: 10/13/2016 Filed or Entered To: 1/3/2022
Billable Pages:	2	Cost:	0.20

Exhibit 8

Fill in this information to identify the case:

Debtor 1	Zia Shlaimoun
Debtor 2	
(Spouse, if filing)	
United States Bankruptcy Court	Central District of California
Case number:	17-10976

FILED
U.S. Bankruptcy Court
Central District of California
7/18/2019
Kathleen J. Campbell, Clerk

**Official Form 410
Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	George P. Eshoo Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor Law Offices of George P. Eshoo	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? George P. Eshoo Name 702 Marshall St Ste 500 Redwood City, CA 94063 Contact phone 650-364-7030 Contact email georgeeshoo@aol.com Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) 702 Marshall St Name Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Official Form 410

Proof of Claim

page 1

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim?	\$ 615229.02 Does this amount include interest or other charges? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information. LEGAL SERVICES [2FEB2015 TO 31JUL2018] AND INTEREST ON UNPAID BALANCE TO 30JUN2019. HARD COSTS PENDING.
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: \$ _____ Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply:</i>	Amount entitled to priority
A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.	<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$	
	<input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$	
	<input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$	
	<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$	
	<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$	
	<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(_) that applies	\$	
<small>* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.</small>			

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 7/18/2019
MM / DD / YYYY

/s/ George P. Eshoo, Esq
Signature

Print the name of the person who is completing and signing this claim:

Name	<u>George P. Eshoo, Esq</u>		
	First name	Middle name	Last name
Title	<u>Attorney [CBN 39081]</u>		
Company	<u>Law Offices of George P. Eshoo</u>		
	Identify the corporate servicer as the company if the authorized agent is a servicer		
Address	<u>702 Marshall St Ste 500</u>		
	Number	Street	
	<u>Redwood City, CA 94063</u>		
	City	State	ZIP Code
Contact phone	<u>650-364-7030</u>	Email	<u>georgeeshoo@aol.com</u>

Case Number: 8:17-bk-10976-TA	702 Marshall St Ste 500
Debtor: Zia Shlaimoun	Redwood City CA 94063
Creditor: Law Offices of George P. Eshoo	650-364-7030
ShlaimounZ_HRLY/Catz/Paya/APL/Oussaha/Misc	georgeeshoo@aol.com
Attorney Fees [Feb. 2, 2015 to July 31, 2018]	\$428,252.30
Costs	data pending
Interest [10% per annum; 30 days grace; July 18, 2019]	\$186,976.72
Total [Interest is ongoing]	\$615,229.02

Exhibit 9

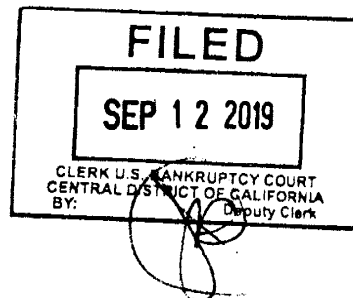
Fill in this information to identify the case:

Debtor 1 ZIA SHLAIMOUN

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: Central District of California

Case number 8:17-bk-10976-TA



Official Form 410

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Tahim and Associates, A Professional Corporation</u> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor <u>Anne Tahim, CPA</u>	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>Tahim and Associates, APC</u> Name <u>2331 W. Lincoln Ave., Suite 300</u> Number Street <u>Anaheim</u> <u>CA</u> <u>92801</u> City State ZIP Code Contact phone <u>(714) 772-4744</u> Contact email <u>atahim@tahimcpas.com</u>	Where should payments to the creditor be sent? (if different) <u>Tahim and Associates, APC</u> Name <u>2331 W. Lincoln Ave., Suite 300</u> Number Street <u>Anaheim</u> <u>CA</u> <u>92801</u> City State ZIP Code Contact phone <u>(714) 772-4744</u> Contact email <u>atahim@tahimcpas.com</u>
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____		
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☒ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ 6,125.00. Does this amount include interest or other charges?
☐ No
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.
Services performed

9. Is all or part of the claim secured? ☒ No
☐ Yes. The claim is secured by a lien on property.
Nature of property:
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? ☒ No
☐ Yes. Check one:

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

	Amount entitled to priority
<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
<input type="checkbox"/> Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$ _____

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/12/2019
MM/DD/YYYY

Anne Tahim
Signature

Print the name of the person who is completing and signing this claim:

Name Anne Tahim
First name Middle name Last name

Title President

Company Tahim and Associates, A Professional Corporation
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 2331 W. Lincoln Ave., Suite 300
Number Street

Anaheim CA 92801
City State ZIP Code

Contact phone (714) 772-4744 Email atahim@tahimcpas.com

Part 2: (7)
Proof of Interest Calculation

Part 2: (7)

Invoice #	Client Name	Invoice Amount	Invoice Date	Invoice Emailed	Balance Due Date	Today's Date	Days to Calculate Interest	Convert Days to Months	Interest	Interest on O/S Balance	Total Due
AT8495	Versailles Investments, LLC	4350.00	05/03/16	05/12/17	06/12/17	09/06/19	816	27.20	1.5%	1774.80	6124.80

Calculations of Days	
Payment Due Date 06/12/17	
06/13/17 - 06/12/18	365
06/13/18 - 06/12/19	365
06/13/19 - 06/30/19	18
07/01/19 - 07/31/19	31
08/01/19 - 08/31/19	31
09/01/19 - 09/06/19	6
Total Days	816

Print 2: (8)
 Proof Services Rendered.

Tahim and Associates, APC

Fax: 714-772-0650

2331 W. LINCOLN AVE., STE 300

ANAHEIM, CA 92801-5103

Invoice

DATE	INVOICE #
5/3/2016	AT8495

BILL TO:

Versailles Investments, LLC
 93 Canyon Creek
 Irvine, CA 92603

TERMS

Due on receipt

DESCRIPTION	AMOUNT
- Coding and posting of checks, automatic credits and debits to the bank, reconciliation of bank accounts for all 12 months of 2014 for both bank accounts. Discussion with client about missing bank statements and debits and credits to bank statements with no explanation.	3,610.00
- Recording of sale of Malibu property	
- Preparation of financial statements (38*\$95)	
Preparation of 2014 Federal and State LLC income tax returns for Versailles Investments, LLC	1,750.00
Preparation of 2015 Federal and State LLC income tax returns for Versailles Investments, LLC	950.00
Called FTB, visit Santa Ana office to deliver the tax returns and payment. (Visit to be made)	500.00
Prepared form 3557 for LLC revivor	
Mileage	40.00
Retainer applied from 4/4/2016 payment	-2,500.00
**Interest Charges for past due invoice **	1,775.00
Total	\$6,125.00
Balance Due	\$6,125.00

*** Please note that all Invoices are due upon receipt. Any unpaid balance is subject to service charge at the rate of 1.5% per month. * Please note that Tahim and Associates, APC does not maintain clients' records for more than 5 year. Client is responsible to maintain their records for any extended period of time. ***

FILED & ENTERED

JUL 17 2019

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY steinber DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:

ZIA SHLAIMOUN

Debtor(s).

Case No.: 8:17-bk-10976-TA

CHAPTER 7

**ORDER REOPENING TIME FOR FILING
CLAIMS**

Date: July 16, 2019

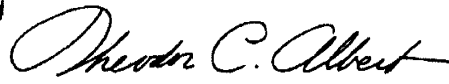
Time: 11:00 a.m.

Courtroom: 5B

A hearing was held on the courts' "Status Conference re Notice Issues and Potential Reopening of Opportunity to File Claims" on the date and time stated above. Appearances were noted on the record. For the reasons stated on the record, the time for filing claims is reopened for a period of 60 days (measured from date of entry of this order) so that creditors who did not receive notice of the opportunity to file claims may do so. The Clerk's Office is instructed to issue such a notice.

##

Date: July 17, 2019



Theodor C. Albert
United States Bankruptcy Judge

(Proof of creditors)

June 20, 2017

Anne Tahim
2331 West Lincoln Avenue
Suite 300
Anaheim, CA 92801

Re: Shlaimoun, Zia

To Whom It May Concern:

On 3/15/17, the above-named debtor(s) filed a voluntary petition under Chapter 7 of the U.S. Bankruptcy Code. The case number is 8:17-BK-10976 TA, U.S. Bankruptcy Court, Central District of California. I am enclosing a copy of the file-stamped Automatic Stay verifying the filing of the Petition.

Under 11 U.S.C. Section 362 (a), you may not:

- take any action against the debtor(s) or the debtor(s)'s property to collect any debt;
- enforce any lien on debtor(s)'s real or personal property;
- repossess any property in debtor(s)'s possession;
- discontinue any service or benefit currently being provided to the debtor(s) by you;
- take any action to evict the debtor(s) from his/her residential dwelling.

A violation of these prohibitions may be considered contempt of court and be punished accordingly.

Sincerely,

/s/ Charles Shamash

Charles Shamash 178110
Caceres & Shamash, LLP
8200 Wilshire Boulevard
Suite 400
Beverly Hills, CA 90211
(310) 205-3400 Fax: (310) 878-8308

Exhibit 10

From: Jennifer Gregory
Sent: Friday, November 19, 2021 11:26 AM
To: atahim@tahimcpas.com
Subject: FW: ZIA SHLAIMOUN 17-10976-TA

Good morning,

I am following up on the attached proof of claim. Have you been able to locate the documents we discussed?

Thank you,

Jennifer Gregory
Trustee Administrator
The Law Offices of Thomas H. Casey, Inc.
26400 La Alameda, Suite 210
Mission Viejo, CA 92691
Direct: (916) 284-7535
Fax: (949) 766-9896

Confidentiality Notice: The information in this e-mail message, including any files or documents attached hereto, is confidential and intended only for the use of the addressee(s) named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone at (949) 766-8787 and return the original message to the sender at the above address. Nothing in this communication is intended to operate as an electronic signature under applicable law.

From: Jennifer Gregory
Sent: Monday, November 15, 2021 2:00 PM
To: Anne Tahim <atahim@tahimcpas.com>
Subject: RE: ZIA SHLAIMOUN 17-10976-TA

Yes, please send what you were able to locate.

Thank you,

Jennifer Gregory
Trustee Administrator
The Law Offices of Thomas H. Casey, Inc.
26400 La Alameda, Suite 210
Mission Viejo, CA 92691
Direct: (916) 284-7535
Fax: (949) 766-9896

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From: Anne Tahim <atahim@tahimcpas.com>
Sent: Friday, November 12, 2021 5:14 PM
To: Jennifer Gregory <jgregory@tomcaseylaw.com>
Subject: Re: ZIA SHLAIMOUN 17-10976-TA

I found the LLC tax returns but I am still looking for personal tax return. Should I send you what I have so far

Get [Outlook for iOS](#)

From: Jennifer Gregory <jgregory@tomcaseylaw.com>
Sent: Friday, November 12, 2021 4:46:56 PM
To: Anne Tahim <atahim@tahimcpas.com>
Subject: FW: ZIA SHLAIMOUN 17-10976-TA

Good afternoon,

I am following up on the attached proof of claim. Have you been able to locate the documents we discussed?

Thank you,

Jennifer Gregory
Trustee Administrator
The Law Offices of Thomas H. Casey, Inc.
26400 La Alameda, Suite 210
Mission Viejo, CA 92691
Direct: (916) 284-7535
Fax: (949) 766-9896

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From: Jennifer Gregory
Sent: Monday, November 8, 2021 5:28 PM
To: atahim@tahimcpas.com
Subject: ZIA SHLAIMOUN 17-10976-TA

Good afternoon,

Thomas H. Casey, Chapter 7 Trustee for the bankruptcy estate of Zia Shlaimoun, is commencing the case closing process and is reviewing all filed proof of claims. Will you please contact me to discuss Claim #15, filed September 12, 2019?

If you have any questions, please don't hesitate to contact me.

Thank you,

Jennifer Gregory
Trustee Administrator
The Law Offices of Thomas H. Casey, Inc.
26400 La Alameda, Suite 210

Mission Viejo, CA 92691

Direct: (916) 284-7535

Fax: (949) 766-9896

Confidentiality Notice: The information in this e-mail message, including any files or documents attached hereto, is confidential and intended only for the use of the addressee(s) named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone at (949)766-8787 and return the original message to the sender at the above address. Nothing in this communication is intended to operate as an electronic signature under applicable law.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

26400 La Alameda, Suite 210, Mission Viejo, CA 92691

A true and correct copy of the foregoing document entitled (*specify*): **Chapter 7 Trustee's Motion for Order Disallowing Claims Filed by: (1) George P. Eshoo, Claim No. 12; (2) George P. Eshoo, Claim No. 13; and (3) Tahim and Associates, a Professional Corporation, Claim No. 15; Memorandum of Points and Authorities; and Declaration of Chapter 7 Trustee Thomas H. Casey** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **December 3, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Eric V Anderton eanderton@catanzarite.com, bphillips@catanzarite.com
- Alan L. Armstrong alan@alanarmstrong.com
- Thomas H Casey kdriggers@tomcaseylaw.com, msilva@tomcaseylaw.com
- Thomas H Casey (TR) msilva@tomcaseylaw.com, thc@trustesolutions.net
- Keneth J Catanzarite kcatanzarite@catanzarite.com
- Timothy P Dillon tdillon@dghmalaw.com, ksauser@dghmalaw.com
- Jamie D Hanawalt ecfcacb@aldridgepate.com, jhanawalt@ecf.inforuptcy.com
- Scott L Keehn scottk@keehnlaw.com, chrisf@keehnlaw.com
- Michael J Lee michael@mjllaw.com
- Dipika Parmar dipika.parmar@aissolution.com
- Charles Shamash cs@locs.com, generalbox@locs.com
- David B Shemano dshemano@shemanolaw.com
- Timothy J Silverman tsilverman@scheerlawgroup.com, tsilverman1@ecf.courtdrive.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- Zann R Welch ecfnofices@ascensioncapitalgroup.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **December 3, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 3, 2021

Kathy Driggers

Date

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

SERVED BY US MAIL:

Interested Party

United States Bankruptcy Court
Attn: Hon. Theodor C. Albert
411 West Fourth Street, Suite 5085
Santa Ana, CA 92701

Debtor

Zia Shlaimoun
6789 Quail Hill Parkway, Suite 414
Irvine, CA 92603

**Special Bankruptcy Counsel for Creditor Amy Hsiao
and Request for Special Notice**

L. Scott Keehn, Esq.
Keehn Law Group, APC
501 W. Broadway, Suite 1025
San Diego, CA 92101

Request for Special Notice

~~BMW Bank of North America Department~~
~~Ascension Capital Group~~
~~P.O. Box 165028~~
~~Irving, TX 75016~~
Forwarding Time Expired
Return to Sender

BMW Financial Services NA, LLC
c/o Ascension Capital Group
4515 N. Santa Fe Avenue
Oklahoma City, OK 73118-7901

Claimants

Tahim and Associates, APC
Attn: Anne Tahim, CPA
2331 W. Lincoln Avenue, Suite 300
Anaheim, CA 92801

George P. Eshoo, Esq.
Law Offices of George P. Eshoo
702 Marshall Street, Suite 500
Redwood City, CA 94063